

March 15, 2021

**RE: LD 226 – *An Act to Limit the Use of Fluorocarbons to Fight Climate Change***

Senator Brenner, Representative Tucker, and members of the Joint Standing Committee on Environment and Natural Resources, my name is Stacey Keefer, Director for the Maine Marine Trades Association and I am a resident of Union. The Maine Marine Trades Association represents an industry that contributes approximately 2.9 billion dollars to our state economy.

Last year I testified on behalf of our industry to express concerns regarding LD 2112 and will do the same for LD 226. We do not oppose the goal of the bill but would appreciate consideration to allow ample time to find alternate product options for structural components commonly found in boats built and/or sold in Maine.

According to our colleagues at the National Marine Manufacturers Association, the boat building industry has been working on eliminating HFC's in recent history and have made great progress. The small number of remaining HFC's used by many boat builders is found in especially important rigid closed-cell foam sheets and buoyancy foams used in the structure of composite hulls. The marine industry (and others such as wind industry, aviation, and aerospace) use these closed-cell foam products in composite structures to reduce weight, which result in making boats and planes more fuel efficient. The foam creates more rigid structures to allow less fiberglass and resin to be used to create comparable structural strength. Boat building has made great progress in materials used and processes used in recent decades but has also been stressed by recent tariff and supply issues. A rapid phase out of structural HFC's used in composite construction could have major economic and technological setbacks.

It is our understanding that the recent federal omnibus bill called the American Innovation and Manufacturing (AIM) Act of 2020 has included mandatory allowances for structural composite foams used in the marine industry. Despite any federal position, our industry is in favor of phasing out the use of HFC's and will advocate for foam manufacturers to work diligently with us to develop alternatives. As options are developed, boat builders may need several more years to qualify and vet the new materials and incorporate them into their current engineering designs. Time will be needed to incorporate substitute materials and their behavioral aspects into production lines that are often scheduled out for months or years.

We hope to work with Maine DEP to better understand the EPA's recent federal preemption, work with our industry to find new products, and work with the ENR Committee as needed to help us avoid any manufacturing and economic roadblocks.

Respectfully,  
Stacey Keefer  
Maine Marine Trades Association, Executive Director